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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA


DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

January 2007 Grand Jury **08 CR 0300 DMS**

UNITED STATES OF AMERICA,)	Criminal Case No. _____
)	
Plaintiff,)	<u>I N D I C T M E N T</u>
)	
v.)	Title 8, U.S.C.,
)	Sec. 1324(a)(2)(B)(ii) -
DIEGO COLIO-JIMENEZ (1),)	Bringing in Illegal Aliens for
JOAQUIN CHAVEZ-CARBAJAL (2),)	Financial Gain; Title 18, U.S.C.,
)	Sec. 2 - Aiding and Abetting;
Defendants.)	Title 8, U.S.C.,
)	Secs. 1324(a)(1)(A)(ii) and
)	(v)(II) - Transportation of
)	Illegal Aliens and Aiding and
)	Abetting

The grand jury charges:

Count 1

On or about January 22, 2008, within the Southern District of California, defendants DIEGO COLIO-JIMENEZ and JOAQUIN CHAVEZ-CARBAJAL, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Erika Garcia-Martinez, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

JDM:fer:San Diego
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Count 2

On or about January 22, 2008, within the Southern District of California, defendants DIEGO COLIO-JIMENEZ and JOAQUIN CHAVEZ-CARBAJAL, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Erika Garcia-Martinez, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 3

On or about January 22, 2008, within the Southern District of California, defendants DIEGO COLIO-JIMENEZ and JOAQUIN CHAVEZ-CARBAJAL, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Cecilia Lozano-Velasquez, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

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Count 4

On or about January 22, 2008, within the Southern District of California, defendants DIEGO COLIO-JIMENEZ and JOAQUIN CHAVEZ-CARBAJAL, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Cecilia Lozano-Velasquez, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 5

On or about January 22, 2008, within the Southern District of California, defendants DIEGO COLIO-JIMENEZ and JOAQUIN CHAVEZ-CARBAJAL, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Damian Garcia-Garcia, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

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Count 6

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2 On or about January 22, 2008, within the Southern District of
3 California, defendants DIEGO COLIO-JIMENEZ and JOAQUIN CHAVEZ-
4 CARBAJAL, with the intent to violate the immigration laws of the
5 United States, knowing and in reckless disregard of the fact that an
6 alien, namely, Damian Garcia-Garcia, had come to, entered and remained
7 in the United States in violation of law, did transport and move said
8 alien within the United States in furtherance of such violation of
9 law; in violation of Title 8, United States Code,
10 Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 7

11
12 On or about January 22, 2008, within the Southern District of
13 California, defendants DIEGO COLIO-JIMENEZ and JOAQUIN CHAVEZ-
14 CARBAJAL, with the intent to violate the immigration laws of the
15 United States, knowing and in reckless disregard of the fact that an
16 alien, namely, Jane Doe had not received prior official authorization
17 to come to, enter and reside in the United States, did bring to the
18 United States said alien for the purpose of commercial advantage and
19 private financial gain; in violation of Title 8,
20 United States Code, Section 1324(a)(2)(B)(ii), and Title 18,
21 United States Code, Section 2.

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Count 8

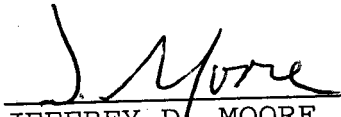
On or about January 22, 2008, within the Southern District of California, defendants DIEGO COLIO-JIMENEZ and JOAQUIN CHAVEZ-CARBAJAL, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Jane Doe, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

DATED: February 6, 2008.

A TRUE BILL:


Foreperson

KAREN P. HEWITT
United States Attorney

By: 
JEFFREY D. MOORE
Assistant U.S. Attorney